

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Offshore Spars Co., et al.¹

Debtors.

Case No. 23-44657
Judge Thomas J. Tucker
Chapter 11
Jointly Administered

**STIPULATION FOR ENTRY OF ORDER CONFIRMING THE 1ST
AMENDED COMBINED PLAN OF LIQUIDATION OF OFFSHORE
SPARS CO. AND REORGANIZATION OF ERIC R. GRACZYK UNDER
BANKRUPTCY CODE SECTION 1191(b)**

NOW COME Offshore Spars Co. and Eric R. Graczyk, the above-captioned debtors (collectively, the “Debtors”), Deborah Fish, Subchapter V Trustee, the Office of the United States Trustee, and Pathward, N.A. (“Pathward” or “Lender”), and Flagstar Bank (“Flagstar”) each by and through their undersigned counsel, agree and stipulate to the entry of the attached order:

Approved as to form and content.

[Signatures on following page]

¹ The Debtors in these jointly administered cases are Offshore Spars Co. (Case No. 23-44657) and Eric G. Graczyk (Case No. 23-44658).

<p>STEVENSON & BULLOCK, P.L.C.</p> <p>By: <u>/s/ Elliot G. Crowder</u> Elliot G. Crowder (P76137) Counsel for Debtor 26100 American Drive, Suite 500 Southfield, MI 48034 Phone: (248) 354-7906 Facsimile: (248) 354-7907 Email: ecrowder@sbplclaw.com</p> <p>Dated: January 16, 2024</p>	<p>OFFICE OF THE U.S. TRUSTEE</p> <p>By: <u>/s/ Ronna G. Jackson</u> Ronna G. Jackson Counsel for US Trustee 211 W. Fort Street, Suite 700 Detroit, MI 48226 Phone: (313) 226-7934 Facsimile: (313) 226-7952 Email: ronna.g.jackson@usdoj.gov</p> <p>Dated: January 16, 2024</p>
<p>TAFT STETTINIUS & HOLLISTER LLP</p> <p>By: <u>/s/ Kimberly R. Clayson</u> Kimberly R. Clayson (P69804) Counsel for Lender 27777 Franklin Road, Suite 2500 Southfield, MI 48034 Tel. (248) 727-1635 Email: kclayson@taftlaw.com</p> <p>Dated: January 16, 2024</p>	<p>ASSISTANT U.S. ATTORNEY</p> <p>By: <u>/s/ Kevin Erskine</u> Kevin Erskine (P69120) Counsel for Internal Revenue Service 211 W. Fort Street, Suite 2001 Detroit, MI 48226 Tel. (313) 226-9610 Email: Kevin.Erskine@usdoj.gov</p> <p>Dated: January 16, 2024</p>
<p>ALLARD & FISH, P.C.</p> <p>By: <u>/s/ Deborah L. Fish</u> Deborah L. Fish (P36580) Subchapter V Trustee 211 West Fort Street Suite 705 Detroit, MI 48226 Phone: (313) 961-6141 Email: dfish@allardfishpc.com</p> <p>Dated: January 16, 2024</p>	<p>SCHNEIDERMAN & SHERMAN PC</p> <p>By: <u>/s/ Michael P. Hogan</u> Michael P. Hogan (P63074) Counsel for Flagstar 23938 Research Dr., Suite 300 Farmington Hills, MI 48335 Phone: (248) 539-7400 Facsimile: (248) 539-7401 Email: mhogan@sspclegal.com</p> <p>Dated: January 16, 2024</p>